

THE MARKS LAW FIRM, P.C.

February 24, 2025

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VIA ECF ONLY

The Honorable Gregory H. Woods
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

RE: **Case Name:** **Jocelyn Pierre v. 208 Rivington St Inc. and Lo-Ho LLC**
Docket Number: **1:24-cv-07766-GHW**
Court: **U.S. District Court, Southern District of New York**

SECOND REQUEST FOR EXTENSION OF TIME

Dear Honorable Judge Woods,

The undersigned represent Plaintiff in this action. Kindly accept this request as Plaintiff's **second request** for the adjournment/extensions of time requested below. This request is made pursuant to 1(e) of Your Honor's rules.

Plaintiff, respectfully requests that the following deadlines and appearances be rescheduled to the following proposed dates:

- 1) The initial conference be adjourned from **March 5, 2025, at 4 pm**, to **April 4, 2025, at 4:00 pm**;
- 2) The time for the parties to file a Joint Proposed Case Management Plan and Joint Letter be extended from **February 26, 2025**, to **March 28, 2025**;
- 3) Defendants time to answer or respond to the Complaint be extended from **February 14, 2025**, to **March 14, 2025**.

A previous request for the adjournment/extensions has been made herein. The reason for this request is that since the inception of this action, Plaintiff has diligently prosecuted this action and made efforts to engage the defendants through a series of phone calls and written communications (letters and emails).

Since the last status report, Plaintiff has touched base with Jeremi Chylinski, Esq. from Gordon Rees Scully Mansukhani, LLP, and has engaged in weekly conversations regarding their representation of Defendant, Lo-Ho LLC ("Lo-Ho") and their general counsel Brian Ullman, Esq. Furthermore, Plaintiff spoke to Mr. Chylinski as recently as February 6, 2025, who advised that he was resolving issues with regard to their representation of Lo-Ho. Following these discussions,

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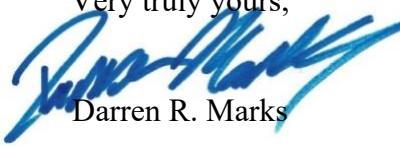
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we emailed Gordon Reese and Mr. Ullman on February 21, 2025, and February 24, 2025, to confirm the status of their representation. Shortly before filing this letter, Mr. Chylinski responded to our last email informing our office that he is currently away and will be back later this week. He consents to this request.

A copy of this letter was shared with Defendants via email prior to its filing. With Your Honor's permission, Plaintiff respectfully requests that it only be required to send Defendants a copy of Your Honor's determination of this request via the email addresses stated below.

Thank you for your attention to the above, please let us know if Your Honor requires any other information.

Very truly yours,



Darren R. Marks

CC: **VIA EMAIL ONLY**

Jeremy Chylinski, Esq.

Gordon Rees Scully Mansukhani, LLP

Email: jchylinski@grsm.com

Mr Freddie Carrillo

208 Rivington St Inc.

Email: pololo315@gmail.com

Application granted in part. Plaintiff's February 24, 2025 request to adjourn the initial pretrial conference, Dkt. No. 10, is granted in part. The initial pretrial conference scheduled for March 5, 2025 is adjourned to April 15, 2025 at 11:00 a.m. The joint status letter and proposed case management plan described in the Court's October 16, 2025 order are due no later than April 8, 2025. The deadline for Defendants to answer or otherwise respond to the complaint is extended to March 14, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 10.

SO ORDERED.

Dated: February 24, 2025

New York, New York



GREGORY H. WOODS

United States District Judge